

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JENNIFER SHARKEY,	:	X
	:	
Plaintiff,	:	Civil Action No.: 10-cv-3824 (DLC)
	:	
v.	:	
	:	
J.P. MORGAN CHASE & CO., JOE KENNEY,	:	
ADAM GREEN, and LESLIE LASSITER, in	:	
their official and individual capacities,	:	
	:	
Defendants.	:	
	X	

Plaintiff Jennifer Sharkey (“Ms. Sharkey”) and Defendants J.P. Morgan Chase & Co., Joe Kenney, Adam Green and Leslie Lassiter (collectively, “Defendants”) (Ms. Sharkey and Defendants, together, the “Parties”), jointly submit the following fourth amended pre-trial order (“JPTO”) pursuant to Rule 5(A) of the Individual Rules and Procedures of the Honorable Denise L. Cote and the Court’s Order of May 5, 2017. The Parties respectfully request that they be permitted to supplement or modify this JPTO as may be necessary or appropriate between now and the date of trial.

i. The full caption of the action.

Sharkey v. J.P. Morgan Chase & Co., Joe Kenney, Adam Green and Leslie Lassiter, in their official and individual capacities, 10 Civ. 3824 (DLC) (S.D.N.Y. 2010).

ii. The names, law firms, addresses, and telephone and fax numbers of trial counsel.

Plaintiff Jennifer Sharkey is represented by:

WIGDOR LLP
Douglas H. Wigdor, Esq.
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Defendants J.P. Morgan Chase & Co., Joe Kenney, Adam Green and Leslie Lassiter are represented by:

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iii. A brief statement as to the basis of subject matter jurisdiction, and a brief statement by each other party as to the presence or absence of subject matter jurisdiction. Such statements shall include citations to all statutes relied on and relevant facts as to citizenship and jurisdictional amount.

This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331, as this action involves federal questions regarding the alleged deprivation of Plaintiff's rights under Section 806 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. § 1514A.

- iv. **A brief summary by each party of the claims and defenses that party has asserted which remain to be tried, without recital of evidentiary matter but including citations to all statutes relied on. Such summaries shall identify all claims and defenses previously asserted which are not to be tried.**

The only claim to be tried is Plaintiff's claim for unlawful retaliation in violation of Section 806 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. § 1514A. The initial Complaint in this action asserted a claim for breach of contract. Dkt. No. 1. This claim was dismissed by the Court on January 14, 2011, and will not be tried. Dkt. No. 16.

Defendants' Answer asserted the affirmative defense that the Court lacks subject matter jurisdiction over this matter. However, the Parties are in agreement that the Court does have subject matter jurisdiction over this matter, and this defense will not be tried.

Plaintiff's Summary

Plaintiff contends that there is one affirmative defense that remains to be tried; namely, that Plaintiff's claims are barred in whole or in part by virtue of the fact that Plaintiff would have been terminated regardless of the alleged protected activity. Defendants' Answer also asserted an affirmative defense that the Complaint fails to state a claim. This defense also will not be tried, as Defendants' motion to dismiss the Amended Complaint for failure to state a claim was denied on August 19, 2011 (*i.e.*, the defense has already been "tried" before Your Honor and rejected). Finally, although Defendants' motion for leave to amend their Answer to add the claim that Plaintiff failed to mitigate her damages was granted, a motion for reconsideration of that Order is currently pending and should be granted for the reasons explained in Plaintiff's moving and reply papers, Dkt. Nos. 230, 243.

Defendants' Summary

Defendants assert that there are three affirmative defenses that remain to be tried; namely, that (i) Plaintiff's claims are barred in whole or in part by virtue of the fact that Plaintiff would have been terminated regardless of the alleged protected activity, (ii) Plaintiff has failed to state a cause of action; and (iii) Plaintiff failed to mitigate her damages.

- v. **A statement by each party as to whether the case is to be tried with or without a jury, and the number of trial days needed.**

This case is to be tried with a jury. The Parties anticipate that 5-7 trial days will be needed. Pursuant to the Court's Order during the May 5, 2017 pre-trial conference, Plaintiff and Defendants will each be limited to 10 hours for the presentation of their opening statements, direct testimony, cross-examination, and re-direct testimony. Any remedies that must be determined by the Court by law should be determined by the Court, not the jury.

- vi. **A statement as to whether or not all parties have consented to trial of the case by a magistrate judge (without identifying which parties have or have not so consented).**

All parties do not consent to trial by a Magistrate Judge.

vii. Any stipulations or agreed statements of fact or law which have been agreed to by all parties.

1. J.P. Morgan Chase & Co. (“JPMC”) is incorporated in Delaware with its principal place of business at 270 Park Avenue, New York, New York 10017.

2. JPMC hired Plaintiff in November 2006.

3. Prior to her employment at JPMC, Plaintiff had been in the banking industry for 11 years and had been employed at Citibank and First Republic Bank, where she had received training on due diligence procedures, the Know Your Client (“KYC”) process, identifying suspicious account activity and reviewing information provided by clients.

4. Plaintiff was employed as a Private Wealth Manager in the JPMC Private Wealth Management (“PWM”) division from the spring of 2008 until she was terminated on August 5, 2009.

5. In the spring of 2008, Leslie Lassiter (“Lassiter”) became the head of the PWM unit in which Plaintiff was employed.

6. At all relevant times, Plaintiff reported directly to Lassiter.

7. Lassiter reported to Adam Green (“Green”) during the relevant time period. Green was, at that time, the head of the Northeast Region of PWM.

8. Green reported to Joseph (Joe) Kenney (“Kenney”) during the relevant time period. Kenney was, at that time, the Chief Executive Officer of PWM.

viii. A statement by each party as to the witnesses whose testimony is to be offered in its case in chief, indicating whether such witnesses will testify in person or by designation.

Plaintiff's Statement

Plaintiff intends to offer the testimony of: (i) Jennifer Sharkey; (ii) Joe Kenney; (iii) Adam Green; (iv) Leslie Lassiter; (v) Kathleen Gruszczyk; (vi) Steven Grande; (vii) “Manager T;” (viii) Anne M. Marchetti; (ix) Scott Goodrich; (x) Michael Spogli; (xi) Veronica Bertrand; (xii) Corey Pettus; (xiii) Patrice O’Malley; (xiv) Lu Ann Bowers; (xv) Janice Barnes; and/or (xvi) any witness Defendants list in this JPTO or any amendment to the JPTO, and/or Defendants otherwise call to testify at trial. At this time, Ms. Gruszczyk, a retired JPMC employee who lives in Chicago, Illinois, is unwilling to appear at trial (despite the fact that she is represented by Defendants’ counsel). Therefore, Plaintiff currently anticipates offering Ms. Gruszczyk’s testimony by designation. However, pursuant to the Court’s Order of May 5, 2017, if Ms. Gruszczyk is available or willing to appear at trial she will appear for Plaintiff’s case in chief.

Plaintiff believes that each of these witnesses will testify in person. Plaintiff reserves the right to call any witness listed by Defendants. Plaintiff reserves the right to call unlisted witnesses for purposes of impeachment, in rebuttal or for the authentication and introduction of a disputed document. Plaintiff also reserves the right to amend and/or supplement this JPTO consistent

with the Federal Rules of Civil Procedure, Local Civil Rules for the Southern and Eastern Districts of New York and/or the Individual Rules of the Honorable Denise L. Cote, or as otherwise appropriate and/or necessary.

Defendants' Statement

Depending on the case-in-chief Plaintiff presents at trial, Defendants may offer the testimony of: (i) Joe Kenney; (ii) Adam Green; (iii) Leslie Lassiter; (iv) Steven Grande; (v) Jennifer Sharkey; and (vi) any witness Plaintiff lists in the JPTO or any amendment to the JPTO, and/or Plaintiff otherwise calls to testify at trial. Kathleen Gruszczky, a retired JPMC employee who lives in Chicago, Illinois is currently unwilling to appear at trial.

At this time, Defendants believe that, in the event they testify, each of the listed witnesses will testify in person, and Defendants will notify the Court and Plaintiff immediately upon learning that a witness is unavailable or, solely in the case of Ms. Gruszczky, available. If an unavailable witness was deposed, Defendants will supplement this JPTO to add deposition designations. Defendants reserve the right to call unlisted witnesses for purposes of impeachment, in rebuttal, or for authentication and introduction of a disputed document. Defendants also reserve the right to amend and/or supplement this JPTO consistent with the Federal Rules of Civil Procedure, Local Civil Rules for the Southern and Eastern Districts of New York and/or the Individual Rules of the Honorable Denise L. Cote, or as otherwise appropriate and/or necessary.

ix. A designation by each party of deposition testimony to be offered in its case in chief, with any cross-designations and objections by any other party.

At this time, the Parties do not anticipate that any witnesses will be unavailable to testify within the meaning of Fed. R. Evid. 32 and/or 45, but reserve the right to designate and introduce the deposition testimony of any witness within a reasonable period of time after it is determined that such witness is unavailable.

Plaintiff's Designations

In addition to the depositions of the parties, six non-party depositions were taken in this action (excluding Plaintiff's expert, who we expect will be available to testify at trial). Two of these non-parties (Steven Grande and Jonathan Spira) are employed by JPMC and were produced for their depositions by JPMC. Plaintiff expects (though JPMC has refused to confirm) that JPMC will produce Mr. Grande and Mr. Spira for trial (the latter, only if necessary, as he is not expected to be called by either party). In the event JPMC ultimately refuses to produce these witnesses for trial, and the witnesses are otherwise unavailable to testify within the meaning of Fed. R. Evid. 32 and/or 45, Plaintiff reserves the right to designate and introduce their deposition testimony. In addition, in light of the Court's July 31, 2017 Order precluding the testimony of the Client A witnesses, Plaintiff does not designate their deposition testimony here. However, Plaintiff reserves the right to call the Client A witnesses in person or through designation in the event that the testimony and evidence at trial results in reconsideration of the July 31, 2017 Order. In the event that Ms. Gruszczky does not appear to testify in person or *via* teleconference, Plaintiff designates the following deposition testimony:

Kathleen Gruszczky:

Designation	Objection	Defendants' Cross-Designations
4:8-16		9:17 - 12:16; 13:15 - 15:16;
4:21-5:12		15:19-15:25; 16:5-18:20;
5:23-24		18:25-19:21; 20:4 - 20:14;
7:13-18		21:4 - 22:17; 31:18-31:21;
9:17-10:4		31:25-32:4; 32:6-32:17;
10:15-12:25		32:22; 34:6-35:4; 40:9 -
13:15-14:11		40:16; 41:3-43:16; 43:21-
14:18-15:5		44:6; 45:14-46:3; 51:19 -
15:9-11		53:21; 54:11 - 56:17; 57:9 -
15:21-25		58:2; 59:13 - 60:11; 60:16 -
16:4-22:17		61:15; 62:2 - 62:10; 64:11 -
24:16-20		64:14; 64:16; 64:17; 64:19 -
30:12-16		67:6; 67:8- 68:2; 68:9 - 68:14;
30:18-31:11		70:12 - 73:11; 75:19 - 76:7;
33:20-23	Fed. R. Evid. 401; Fed. R. Evid. 402 (Defendants conditionally cross-designate 25:2-25:11; 25:18-25:22; 26:8-29:4; 29:19-30:5 if this objections is overruled)	77:9 - 78:19; 80:11 - 80:22; 81:5-82:3; 82:15 - 83:10; 86:9 - 86:15; 87:11 - 88:5; 88:7-88:21; 91:3 - 93:19; 104:3-104:8; 106:10 - 106:19; 107:24-108:8; 108:10-108:12; 121:10 - 121:25; 122:4-124:2; 132:21 - 133:9; 133:12-133:16; 175:6 - 175:9; 178:19 - 178:21; 178:24-179:7; 192:18 - 193:17; 196:3 - 202:4; 202:6-202:9; 209:15 - 216:9; 218:19 - 220:2; 221:18 - 223:10; 223:25-224:23; 225:8 - 226:20; 232:4 - 233:8; 235:3 - 235:10

Designation	Objection	Defendants' Cross-Designations
33:25-34:9	Fed. R. Evid. 401; Fed. R. Evid. 402 (Defendants conditionally cross-designate 25:2-25:11; 25:18-25:22; 26:8-29:4; 29:19-30:5 if this objection is overruled)	
35:17-36:5	Fed. R. Evid. 401; Fed. R. Evid. 402	
36:9-14	Fed. R. Evid. 401; Fed. R. Evid. 402	
38:10-39:6	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
39:7-25	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
41:11-41:19		
42:6-43:16		
46:23-25		
49:7-22		
50:4-23		
51:4-7		
51:19-53:19		
54:2-6		
58:13-24		
60:12-61:12		
61:16-25		
62:5-10		
64:20-66:6		
67:16-68:2		

Designation	Objection	Defendants' Cross-Designations
68:3-8		
68:15-25	Fed. R. Evid. 401; Fed. R. Evid. 402	
69:4-17	Fed. R. Evid. 401; Fed. R. Evid. 402	
72:24-73:11		
76:20-78:3		
80:18-22		
81:5-14		
82:4-9		
84:23-85:4	Fed. R. Evid. 401; Fed. R. Evid. 402	
85:7-18		
86:4-11		
87:11-20		
88:22-89:17	Fed. R. Evid. 401; Fed. R. Evid. 402	
90:2-91:2	Fed. R. Evid. 401; Fed. R. Evid. 402	
91:3-9:10		
92:8-12		
93:20-94:13	Fed. R. Evid. 401; Fed. R. Evid. 403	
94:14-18	Fed. R. Evid. 401; Fed. R. Evid. 403	
98:19-99:5	Fed. R. Evid. 401; Fed. R. Evid. 402	
101:22-102:4	Fed. R. Evid. 401; Fed. R. Evid. 402	
106:6-19		

Designation	Objection	Defendants' Cross-Designations
107:3-23	Fed. R. Evid. 401; Fed. R. Evid. 402	
109:2-6	Fed. R. Evid. 401; Fed. R. Evid. 402	
113:19-114:10	Fed. R. Evid. 401; Fed. R. Evid. 402; Court's January 17 and 26, 2017 Rulings	
115:3-7	Fed. R. Evid. 401; Fed. R. Evid. 402; Court's January 17 and 26, 2017 Rulings	
119:24-120:2	Fed. R. Evid. 401; Fed. R. Evid. 402	
120:22-121:3		
121:10-23		
122:7-123:21		
124:3-15		
126:13-127:6	Fed. R. Evid. 401; Fed. R. Evid. 402	
127:22-24	Fed. R. Evid. 401; Fed. R. Evid. 402	
128:8-13	Fed. R. Evid. 401; Fed. R. Evid. 402	
129:4-20	Fed. R. Evid. 401; Fed. R. Evid. 402	
130:6-14	Fed. R. Evid. 401; Fed. R. Evid. 402	

Designation	Objection	Defendants' Cross-Designations
130:22-131:2	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
138:15-19	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602 (Lack of Foundation)	
154:6-155:17	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
155:22-156:16	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
157:21-159:18	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
165:23-167:2	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
169:20-22	Fed. R. Evid. 401; Fed. R. Evid. 402; Fed. R. Evid. 602	
170:9-13	Fed. R. Evid. 401; Fed. R. Evid. 402	
171:2-18		
173:17-175:3		

Designation	Objection	Defendants' Cross-Designations
175:15-176:11	Fed. R. Evid. 401; Fed. R. Evid. 402 (Defendants conditionally cross-designate 176:16-178:18 if this objections is overruled)	
183:19-184:9	Fed. R. Evid. 401; Fed. R. Evid. 402	
184:12-185:10		
186:7-15		
196:3-8		
196:16-20		
196:24-197:14		
198:13-199:4		
202:10-203:18		
205:25-209:5		
221:5-17	Fed. R. Evid. 401; Fed. R. Evid. 402	
229:8-10	Fed. R. Evid. 401; Fed. R. Evid. 402	
230:6-8	Fed. R. Evid. 401; Fed. R. Evid. 402	
230:11-13	Fed. R. Evid. 401; Fed. R. Evid. 402	

Defendants' Designations

Since her deposition, Ms. Gruszczyk has left JPMC. She currently resides in Chicago and is unwilling to testify at trial. Therefore, Defendants have designated the following portions of the deposition transcript of Ms. Gruszczyk. Defendants have removed any designations for Client A, the son of Client A, and the wife of Client A in light of the Court's rulings on July 31, 2017.

Kathleen Gruszczky:

Designation	Objection	Plaintiff's Cross-Designations
9:17 - 12:16	n/a	4:8-16, 4:21-5:12, 5:23-24,
13:15 - 15:16	n/a	7:13-18, 9:17-10:4, 10:15-
15:19-15:25	n/a	12:25, 13:15-14:11, 14:18-
16:5-18:20	n/a	15:5, 15:9-11, 15:21-25, 16:4-
18:25-19:21	n/a	22:17, 24:16-20, 30:12-16,
20:4 - 20:14	n/a	30:18-31:11, 33:20-23,
21:4 - 22:17	n/a	33:25-34:9, 35:17-36:5, 36:9-
		14, 38:10-39:6, 41:11-41:19 ,
		42:6-43:16, 49:7-22, 50:18-
31:18-31:21	n/a	23, 51:4-7, 51:19-53:21, 54:2-
31:25-32:4; 32:6-32:17;	n/a	6, 60:16-61:12, 61:16-25,
32:22		62:5-10, 64:20-66:6. 67:16-
34:6-35:4	n/a	68:2, 71:5-12, 72:24-73:11,
40:9 - 40:16; 41:3-43:16	FRE 401/403 (as to 41:25 – 42: 2)	76:20-78:3, 80:18-22, 81:5-
43:21-44:6	n/a	14, 84:23-85:4, 85:7-18, 86:4-
45:14-46:3	FRE 401/403	11, 87:11-20, 88:22-89:17,
51:19 - 53:21	n/a	90:2-91:10, 92:8-12, 98:19-
54:11 - 56:17	n/a	99:5, 101:22-102:4, 106:6-19,
57:9 - 58:2	n/a	107:3-23, 109:2-6, 119:24-
59:13 - 60:11	FRE 401/403/ 602	120:2, 120:22-121:3, 121:10-
60:16 - 61:15	n/a	23, 122:7-123:21, 124:3-15,
62:2 - 62:10	FRE 401/403 (as to 62:2-4, 62:11 – 19)	126:20-127:6, 127:22-24,
64:11 - 64:14; 64:16; 64:17; 64:19-67:6; 67:8- 68:2	n/a	128:8-13, 129:4-8, 130:6-14,
68:9 - 68:14	n/a	130:22-131:2, 138:15-19,
70:12 - 73:11	n/a	154:23-155:17, 155:22-
75:19 - 76:7	n/a	156:16, 157:21-158:21,
77:9 - 78:19	FRE 401/403/602 (as to 78:10 – 19)	165:23-167:2, 169:20-22, 170:9-13, 173:17-175:3, 175:15-176:11, 183:19-184:9, 184:12-185:10, 186:7-15, 196:3-8, 196:16-20, 196:24- 197:14, 198:13-199:4, 202:10-203:18, 205:25-209:5, 221:5-17, 229:8-10, 230:6-8, 230:11-13

80:11 - 80:22; 81:5-82:3	n/a	
82:15 - 83:10	FRE 401/403 (as to 83:4-10)	
86:9 - 86:15	FRE 401/403 (as to 86:12 – 15)	
87:11 - 88:5; 88:7-88:21	n/a	
91:3 - 93:19	FRE 401/403/ 801 (as to 92:13 – 94:22)	
104:3-104:8	FRE 401/403, FRE 602 (as to 104:3-6)	
106:10 - 106:19; 107:24- 108:8; 108:10-108:12	FRE 401/403/ 602 (as to 107:24 – 108:12)	
121:10 - 121:25; 122:4- 124:2	FRE 401/403/ 602 (as to 132:22 – 124:2)	
132:21 - 133:9; 133:12- 133:16	n/a	
175:6 - 175:9	n/a	
178:19 - 178:21; 178:24- 179:7	n/a	
192:18 - 193:17	n/a	
196:3 - 202:4; 202:6-202:9	n/a	
209:15 - 216:9	Leading questioning by witness' attorney	
218:19 - 220:2	Leading questioning by witness' attorney	
221:18 - 223:10; 223:25- 224:23	Leading questioning by witness' attorney	
225:8 - 226:20	Leading questioning by witness' attorney (226:4-20)	

232:4 - 233:8	FRE 401/403	
235:3 - 235:10	FRE 401/403	

x. A list by each party of exhibits to be offered in its case in chief, with one star indicating exhibits to which no party objects on grounds of authenticity, and two stars indicating exhibits to which no party objects on any ground

Plaintiff's Exhibits:

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**)¹
n/a		Enlarged versions of the exhibits of any party	
n/a		Enlarged excerpts of the deposition or trial testimony of any witness	
n/a		Electronic highlighting and/or cropping and/or “pop-outs” of the exhibits of any party	
n/a		Electronic highlighting and/or cropping and/or “pop-outs” of the deposition or trial testimony of any witness	
n/a		Compilations of information contained within the exhibits of any party, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information	

¹ The objections provided herein are provided in a good faith attempt to comply with Rule 5(A) of the Individual Practices in Civil Cases of the Honorable Denise L. Cote. However, depending on the course of the trial, the evidence adduced at trial and the Court's rulings as to the admissibility of various categories of evidence, Defendant may object to the introduction of documents listed herein (or on any subsequent amendment of the JPTO) despite having not indicated an objection herein. Moreover, Defendants' objections herein are made without knowledge as to the purpose for which any particular document may be introduced and Defendants may object to the introduction of documents based on the purpose for which they are used even if an objection is not indicated herein. As such, Defendants reserve the right to object to the introduction of any document at trial regardless of whether such documents are objected to herein.

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
n/a		Compilations of the deposition or trial testimony of any witness, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information	
1	JPMC HC 0000057 – 65	Certificate of Incorporation and Related Documents	**
2	JPMC HC 0000101	NYS Department of State Entity Information	*
3	JPMC HC 0000041	Fax dated August 18, 2002	*
4	JPMC HC 0000036	Form W-8BEN	*
5	JPMC HC 0000034 – 35	Bank Authorization	*
6	JPMC HC 0000071 – 77	Investment Account Application	**
7	JPMC HC 0000819 – 39	Due Diligence Report	**
8	JS 0239 – 40	Plaintiff's Resume	**
9	JS 001 – 03	Plaintiff's Employment Agreement	**
10	JPMC HC 0000037 – 40	Personal Trust Account Review	*
11	JS 0089 – 92	Release Agreement	*
12	JPMC HC 0000049 – 50	Letter dated December 21, 2006	*
13	JPMC HC 0000047 – 48	Letter dated December 22, 2006	*
14	JPMC HC 0000090 – 91	Handwritten Notes	**
15	JPMC HC 0000089	Email dated October 16, 2007	*
16	JPMC HC 0000088	Email dated October 19, 2007	*
17	JPMC HC 0000380 – 383	Fax dated October 22, 2007	*
18	JPMC HC 0000053 – 54	Fax dated November 2, 2007	*
19	JPMC HC 0000055	Email dated December 5, 2007	*
20	JPMC HC 0001897 – 903	KYC Approval Verify & Confirm	**
21	JPMC HC 0000490	Earnings Statement (with redactions)	**
22	JS 0526 – 532	Bank Secrecy Act Anti-Money Laundering Examination Manual	**
23	JPMC2-00083663 – 700	Email dated April 18, 2008 and attachment	**
24	JPMC HC2 0000080 – 82	KYC Summary	**

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
25	JPMC HC 0001918 – 23	KYC Approval Verify & Confirm	**
26	JPMC HC 0003038 – 47	KYC Summary	**
27	JPMC-00003043 – 49	Email dated September 5, 2008	**
28	JPMC HC 0000779, 803	Portions of Presentation	*
29	JPMC2-00004070 – 71	Email dated December 5, 2008	**
30	JPMC HC 0000332 – 35	KYC Summary	**
31	JPMC HC 0000011 – 17	KYC Summary	**
32	JPMC HC 0000018 – 25	KYC Summary	**
33	JPMC HC 0003029 – 37	KYC Summary	**
34	JPMC HC2 0000083 – 85	KYC Summary	**
35	JPMC HC2 0000104 – 06	KYC Summary	**
36	JPMC HC 0001878 – 81	KYC Approval Verify & Confirm	**
37	JPMC HC 0001888 – 92	KYC Approval Verify & Confirm	**
38	JPMC HC 0001893 – 96	KYC Approval Verify & Confirm	**
39	JPMC HC 0001904 – 08	KYC Approval Verify & Confirm	**
40	JPMC HC 0000092 – 96	Email dated December 17, 2008	*
41	JPMC2-00009950 – 54	Email dated December 17, 2008	*
42	JPMC2-00030946 – 67	Email dated December 17, 2008 and attachments	*
43	JPMC HC 0000742 – 746	KYC Business Case Exception Form	*
44	JPMC HC 0002959 – 63	KYN Business Case Exception Form	*
45	JPMC HC 0000001 – 10	KYC Summary	**
47	JPMC2-00000243 – 44	Email dated January 23, 2009	*
48	JPMC2-00090605 – 13	HALO Case Summary	*
49	JPMC2-00090126	Client A Timeline	*
50	JS 0081 – 88	Relationship Review	*
51	JPMC2- 0005239-0005273	Email dated November 24, 2008 with spreadsheets	*
52	JPMC HC 0001042, 1088	New Hire Welcome Book	*
53	JS 0047 – 48	Plaintiff's Individual Scorecard	**
54	JPMC HC 0000519	Earnings Statement (with redactions)	**

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
55	JPMC2-00042749 – 55	Email dated January 17, 2008 and attachments	*
56	JPMC2-00036724	Email dated January 18, 2009	*
57	JPMC HC2 0000533 – 39	KYC Summary	**
58	JPMC2-00037210 – 17	Meeting Invite dated January 22, 2009 and attachments	*
59	JPMC HC 0001882 – 87	KYC Approval Verify & Confirm	**
60	JPMC2-00009811 – 18	Email dated January 23, 2009 and attachments	*
61	JPMC HC 0000521	Earnings Statement (with redactions)	*
62	JPMC2-00000463	Email dated February 25, 2009	*
63	JPMC2-00000480	Email dated March 6, 2009	*
64	JPMC2-00000196 – 205	Email dated March 6, 2009	*
65	JPMC2-00000206 – 09	Email dated March 9, 2009	*
66	JPMC2-00030891 – 92	Email dated March 13, 2009	*
67	JPMC2-00030889 -90	Email dated March 13, 2009	*
68	JPMC2-00000490 – 93	Email dated March 21, 2009	*
69	JPMC2-00000542 – 44	Email dated March 23, 2009	*
70	JPMC HC2 0000037 – 41	KYC Summary	**
71	JPMC HC 0001909 – 14	KYC Approval Verify & Confirm	**
72	JPMC2-00000452 – 53	Email dated March 24, 2009	*
73	JPMC HC 0001461 – 63	Letter dated March 25, 2009	*
74	JPMC2-00000218	Email dated March 25, 2009	*
75	JPMC2-00000516 – 19	Email dated March 25, 2009	*
76	JPMC2-00012494 – 500	Email dated March 26, 2009	*
77	JPMC2-00010956 – 63	Email dated March 26, 2009	*
78	JPMC2-00010880 – 86	Email dated April 1, 2009	*
79	JPMC2-00010928 – 36	Email dated April 2, 2009	*
80	JPMC2-00007931 – 37	Email dated April 2, 2009	*
81	JPMC-00007240 – 47	Email dated April 3, 2009	**
82	JPMC2-00010887 – 90	Email dated April 3, 2009	*
83	JPMC-00005980	Email dated April 6, 2009	*
84	JPMC-00007238	Email dated April 6, 2009	*
85	JPMC-00006681	Email dated April 6, 2009	*
86	JPMC2-00012785	Email dated April 6, 2009	*

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
87	JPMC-00000255	Email dated April 7, 2009	**
88	JPMC-00006651 – 60	Email dated April 7, 2009	**
89	JPMC-00001116 – 25	Email dated April 7, 2009	**
90	JPMC-00006612 – 20	Email dated April 7, 2009	**
91	JPMC-00000965 – 66	Email dated April 8, 2009	*
92	JPMC-00002565 – 67	Email dated April 8, 2009	**
93	JPMC2-00009303 – 07	Email dated April 8, 2009	*
94	JPMC-00000701 – 06	Email dated April 8, 2009 and attachments	**
95	JPMC-00000254	Email dated April 8, 2009	**
96	JPMC-00006591 – 93	Email dated April 22, 2009 and attachment	**
97	JPMC2-00010896 – 907	Email dated April 22, 2009 and attachments	*
98	JPMC-00000712 – 14	Email dated April 22, 2009 and attachment	**
99	JPMC-00006586 – 89	Email dated April 22, 2009 and attachment	**
100	JPMC-00001105 – 07	Email dated April 22, 2009 and attachment	**
101	JPMC HC2 0000181	Handwritten Notes	**
102	JPMC 0002252 – 53	Email dated April 24, 2009	*
103	JPMC-00006583	Email dated April 27, 2009	**
104	JPMC-00005975	Email dated April 27, 2009	**
105	JPMC-00005973	Email dated April 27, 2009	**
106	JPMC2-00089389 – 91	Email dated April 29, 2009	*
107	JPMC2-00087596	Email dated April 29, 2009	*
108	JPMC HC2 0000184 – 85	Letter dated April 30, 2009	**
109	JS 0013 – 44	Code of Conduct	**
110	JPMC-00001042 – 1104	Email dated May 1, 2009 and attachment	**
111	JPMC-00000715 – 78	Email dated May 4, 2009 and attachment	**
112	JPMC-00000967 – 1030	Email dated May 4, 2009 and attachment	**
113	JPMC-00001139 – 44	Email dated May 4, 2009	**
114	JPMC-00002239	Email dated May 4, 2009	**

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
115	JPMC-00002183	Meeting Calendar Entry dated May 5, 2009	**
116	JPMC-00001376	Email dated May 5, 2009	**
117	JPMC2-00089882 – 85	Emails dated May – August 2009	*
118	JPMC2-00006856 – 60	Email dated May 11, 2009	*
119	JPMC2-00043078 – 79	Email dated May 15, 2009 and attachment	*
120	JPMC-00000963	Email dated May 16, 2009	**
121	JPMC-00005933	Email dated May 22, 2009	**
122	JPMC-00006320 – 21	Email dated May 22, 2009	**
123	JPMC HC2 0000269 – 88	Midyear 2009 Talent Review	**
124	JPMC HC2 0000202	Plaintiff's Individual Scorecard	*
125	JPMC-00006986	Email dated June 8, 2009	**
126	JPMC-00003023	Email dated June 11, 2009	*
127	JPMC-00003022	Email dated June 11, 2009	*
128	JPMC-00003020	Email dated June 11, 2009	*
129	JPMC-00003018	Email dated June 11, 2009	*
130	JPMC-00003012	Email dated June 15, 2009	*
131	JPMC-00002924 – 55	Email dated June 24, 2009 and attachments	*
132	JPMC-00002915	Email dated June 26, 2009	*
133	JPMC-00002911	Email dated June 26, 2009	**
134	JPMC2-00002642 – 62	Email dated June 26, 2009	**
135	JPMC2-00087894 – 929	Email dated June 26, 2009 and attachment	*
136	JPMC-00002897 – 98	Email dated June 29, 2009	*
137	A000095 – 96	Email dated June 30, 2009	*
138	JPMC-00002842	Email dated July 1, 2009	**
139	JPMC2-00002686 – 736	Email dated July 3, 2009	**
140	JPMC-00001033	Email dated July 5, 2009	**
141	JPMC2-00064629 – 93	Email dated July 7, 2009 and attachment	**
142	JPMC-00002800	Meeting Invite dated July 7, 2009	**
143	JPMC-00001348 – 51	Email dated July 10, 2009 and attachments	**
144	JPMC2-00002685	Email dated July 21, 2009	**
145	JPMC2-00064731	Email dated July 21, 2009	**

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
146	JPMC HC2 0000190	Email dated July 23, 2009	**
147	JPMC-00002723	Email dated July 24, 2009	**
148	JPMC-00002552 – 54	Email dated July 24, 2009	**
149	JPMC-00002716	Email dated July 26, 2009	**
150	JPMC-00002548 – 50	Email dated July 27, 2009	**
151	JS 0049 – 51	Email dated July 27, 2009 and attachments	*
152	JPMC-00001146	Email dated July 28, 2009	**
153	JPMC-00002704	Email dated July 28, 2009	**
154	JPMC HC2 0000191	Meeting Invite dated July 28, 2009	**
155	JPMC-00000700	Meeting Invite dated July 28, 2009	**
156	JPMC-00001338 – 40	Email dated July 28, 2009 and attachments	**
157	JPMC-00001337	Email dated July 29, 2009	**
158	JPMC2-00088262	Email dated July 29, 2009	**
159	JPMC-00000710	Email dated July 31, 2009	**
160	JPMC-00002281	Email dated July 31, 2009	**
161	JPMC-00002611	Email dated August 4, 2009	**
162	JS 0282 – 84	Handwritten Notes	*
163	JPMC HC2 0000216	Handwritten Notes	**
164	JPMC HC2 0000217 – 18	Handwritten Notes	**
165	JPMC2-00000552 – 53	Email dated August 6, 2009	**
166	JPMC HC 0000737 – 39	Corrective Action	**
167	JPMC2-00089379	Email dated August 27, 2009	**
168	JPMC2-00064607 – 28	Email dated September 25, 2009 and attachment	**
169	JPMC2-00089012	Email dated September 8, 2009	**
170	JPMC2-00088399	Email dated September 16, 2009	**
171	JPMC2-00072124	Email dated September 17, 2009	**
172	JPMC2-00072196	Email dated September 17, 2009	**
173	JPMC2-00064607	Email dated September 25, 2009	*
174	JPMC2-00072194	Email dated September 29, 2009	**
175	JPMC2-00072190	Email dated September 30, 2009	*
176	JPMC2-00088473 – 75	Email dated October 1, 2009	*
177	JPMC2-00087796	Fax dated October 2, 2009	*
178	JPMC2-00007380	Email dated October 9, 2009	*

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
179	JPMC2-00088673 – 77	Email dated October 23, 2009	*
180	JS – 0237	Earnings Statement (with redactions)	**
181	JS 0238	Earnings Statement (with redactions)	**
182	JS 0332	Form W-2 (with redactions)	**
183	JS 0333	Form 1099-G (with redactions)	**
184	JPMC2-00088715	Email dated November 4, 2009	*
185	JPMC HC2 0000026 – 31	KYC Summary	**
186	JPMC2-00072150	Email dated November 19, 2009 and attachment	*
188	JPMC2-00000550 – 51	Email dated December 10, 2009	**
189	JPMC2-00072133	Email dated December 20, 2009	*
190	JPMC2-00007842	Email dated December 20, 2009	*
194	JPMC2-00064706 – 11	Email dated January 13, 2010	**
195	JPMC2-00007788 – 93	Email dated January 15, 2010	**
196	JPMC2-00007729 – 87	Email dated January 17, 2010	*
197	JPMC2-00072131	Email dated January 28, 2010	*
198	JPMC2-00089228 – 29	Email dated January 28, 2010	*
199	JPMC2-00064599 – 604	Email dated February 24, 2010	**
200	JPMC2-00088766 – 67	Email dated March 8, 2010	*
201	JPMC2-00088154 – 55	Email dated May 25, 2010	*
202	JPMC HC2 0000014 – 18	Approval Verify & Confirm	**
203	JPMC2-00007700 – 08	Email dated May 27, 2010 and attachment	*
204	JPMC2-00090113 – 29	Email dated July 15, 2010 without attachments	*
205	JPMC HC2 0000374 – 77	KYC Approval Verify & Confirm	**
206	JPMC2-00007400	Email dated November 1, 2010	*
207	JS 0334	Form 1099-G	**
208	JPMC2-00007387 -88	Email dated January 31, 2011	*
209	N/A	Amended Complaint	*
210	JS 0518 – 25	Consent Order	*
211	JS 0374 – 505	Report Regarding 2012 CIO Losses	*

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
212	N/A	Bio and Resume of Anne M. Marchetti	*
222	N/A	Letter dated January 6, 2014 with attachments	*
224	JS 0243	Itinerary	*
225	JS 0244 – 98	Notes	*
226	JS 0299	Email dated October 13, 2010	*
227	JS 0300 – 01	Email dated October 7, 2010	*
228	JS 0302	Email dated September 17, 2009	*
229	JS 0303 – 04	Email dated September 8, 2009	*
230	JS 0305	Email dated September 2, 2009	*
231	JS 0306 – 07	Email dated October 16, 2009	*
232	JS 0308	Email dated November 11, 2009	*
233	JS 0309	Email dated December 2, 2009	*
234	JS 0310	Email dated October 14, 2009	*
235	JS 0311	Email dated November 30, 2009	*
236	JS 0312	Email dated December 2, 2009	*
237	JS 0313 – 14	Email dated March 16, 2010 and attachment	*
238	JS 0315 – 19	Email dated October 16, 2009	*
239	JS 0320 – 23	Email dated September 29, 2009	*
242	JS 0067 – 80	Spreadsheets	*
243	JPMC2-00007710	Email dated April 28, 2010	*
244	N/A	Plaintiff's Form U5	*
245	JS 0533 – 41	Article dated July 25, 1995	
246	JS 0542 – 43	Article dated June 19, 1995	
247	JS 0544 – 54	Article dated August 1, 1995	
248	JPMC-00002379	Email dated April 3, 2009	*
249	JPMC2-00000045 – 46	Email dated August 14, 2009 and attachment	*
250	JPMC2-00007843	Email dated December 20, 2009	*
251	JPMC2-00012723 – 28	Email dated March 4, 2009 and attachments	*
252	JPMC2-00036394	Email dated December 19, 2008	*
253	JPMC2-00037199	Meeting invite dated April 7, 2009	*
254	JPMC2-00037207	Meeting invite dated January 28, 2009	*

Exhibit Number	Bates No.	Description	No Authenticity Objection (*) No Objection (**) ¹
255	JPMC2-00043094 – 100	Email dated March 4, 2009 and attachment	*
256	JPMC2-00064605 – 06	Email dated March 16, 2010	*
257	JPMC2-00064694 – 99	Email dated February 8, 2010	*
258	JPMC2-00064700 – 01	Email dated February 8, 2010	*
259	JPMC2-00064702 – 03	Email dated January 29, 2010	*
260	JPMC2-00072140 – 41	Email dated December 7, 2009	*
261	JPMC2-00072158 – 59	Email dated November 18, 2009	*
262	JPMC2-00072182 – 83	Email dated October 2, 2009	*
263	JPMC2-00072197	Email dated September 17, 2009	*
264	JPMC2-00072204	Meeting invite dated August 26, 2009	*
265	JPMC2-00087631 – 34	Email dated March 30, 2009	*
266	JPMC2-00087747 – 52	Email dated March 1, 2009 and attachments	*
267	JPMC2-00088529 – 32	Email dated August 18, 2009 and attachments	*
268	JPMC2-00089093 – 94	Email dated September 29, 2009	*
269	JPMC2-00089242	Email dated November 6, 2009	*
270	JPMC2-00007930 – 37	Email dated April 2, 2009	*
271	JPMC-HC4-000070	Notes	*

To the extent all members of a document family are not listed above, Plaintiff reserves the right to offer into evidence any other members of the document family if not included in the above Bates range.

Plaintiff reserves the right to offer into evidence any and all exhibits listed by Defendants. Plaintiff also reserves the right to supplement this exhibit list with any documents still to be produced. Plaintiff reserves the right to use unlisted exhibits for purposes of impeachment or rebuttal or any other purpose permitted by the Fed. R. Evid. Plaintiff also reserves the right to amend and/or supplement this JPTO consistent with the Federal Rules of Civil Procedure, Local Civil Rules for the Southern and Eastern Districts of New York and/or the Individual Rules of the Honorable Denise L. Cote, or as otherwise appropriate and/or necessary.

Plaintiff reserves the right to object to the admissibility of any of Defendants' exhibits at trial depending on the basis on which and/or purpose for which Defendants seek to use any listed exhibit. In addition, as indicated below, Plaintiff does not object to the authenticity of any of Defendants' exhibits in that Plaintiff does not claim that any of Defendants' exhibits are fabricated or fraudulent. However, Plaintiff does reserve the right to object to the introduction of any exhibit through a witness in contravention of Fed. R. Evid. 901.

Plaintiff specifically reserves the right to add any or all of the documents bearing Bates-stamp numbers JPMC-HC4-0000001 - JPMC-HC4-0000050 to her exhibit list. The documents bearing the Bates-stamped numbers JPMC-HC4-0000001 - JPMC-HC4-0000050 were produced in February and April 2017, whereas discovery closed in July 2013. As such, the parties have agreed that the author of the documents bearing the Bates-stamped numbers JPMC-HC4-0000001 - JPMC-HC4-0000050 will be re-deposed between now and trial regarding these documents. Within 15 days following that deposition, Plaintiff will designate any documents within the Bates-stamp range of JPMC-HC4-0000001 - JPMC-HC4-0000050 that she intends to introduce in her case in chief. Plaintiff specifically reserves all objections to Defendants' introduction of any documents within the Bates-stamp range of JPMC-HC4-0000001 - JPMC-HC4-0000050, including any objections based on the timing of the production of these documents.

In the parties' prior JPTO, Defendants stipulated to the admissibility of Plaintiff's Exhibits 15 (JPMC HC 0000089), 16 (JPMC HC 0000088), 17 (JPMC HC 0000380 - JPMC HC 0000383), 18 (JPMC HC 0000053 - JPMC HC 0000054) 19 (JPMC HC 0000055), 47 (JPMC2-00000243), 63 (JPMC2-00000480), 64 (JPMC2-00000196), and 72 (JPMC2-00000452 - JPMC2-00000453). The reason for this was that these documents are authored by individuals who the parties did not intend to call at trial. Therefore, rather than expend the time and resources to subpoena these individuals, and lengthen the trial unnecessarily, the parties agreed that the documents were admissible so that they could be introduced through witnesses other than the authors of the documents.

Defendants now object to the admissibility of all of these documents on relevance grounds because they have interpreted Your Honor's statements and rulings at the May 5, and July 31, 2017 Court conferences as indicating that these documents are no longer relevant. However, it is our position that Your Honor's July 31, 2017 Order holds only that Client A will not be called at trial, and says nothing about the admissibility of any documents. In an attempt to compromise (and not be forced to call more witnesses), Plaintiff proposed that Defendants assert their relevance objections at trial, but that, if the objections are overruled, the parties stipulate (as they had previously) to the admissibility of these documents. Defendants have declined to agree, and thus we have been forced to add six witnesses to our witness list: (i) Scott Goodrich; (ii) Michael Spogli; (iii) Veronica Bertrand; (iv) Corey Pettus; (v) Patrice O'Malley; and (vi) Lu Ann Bowers.

Defendants' Exhibits:

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**)²
n/a		Enlarged versions of the exhibits of any party	
n/a		Enlarged excerpts of the deposition or trial testimony of any witness	
n/a		Electronic highlighting and/or cropping and/or “pop-outs” of the exhibits of any party	
n/a		Electronic highlighting and/or cropping and/or “pop-outs” of the deposition or trial testimony of any witness	
n/a		Compilations of information contained within the exhibits of any party, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information	
n/a		Compilations of the deposition or trial testimony of any witness, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information	
D-4.	JPMC HC 0000001 - JPMC HC 0000031	KYCs	**
D-5.	JPMC HC 0000032 - JPMC HC 0000136	Files	*

² The objections provided herein are provided in a good faith attempt to comply with Rule 5(A) of the Individual Practices in Civil Cases of the Honorable Denise L. Cote. However, depending on the course of the trial, the evidence adduced at trial and the Court's rulings as to the admissibility of various categories of evidence, Plaintiff may object to the introduction of documents despite having not indicated an objection herein. Moreover, Plaintiff's objections herein are made without knowledge as to the purpose for which any particular document may be introduced and Plaintiff may object to the introduction of documents based on the purpose for which they are used even if an objection is not indicated herein. As such, Plaintiff reserves the right to object to the introduction of any document at trial regardless of whether such documents are objected to herein.

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**) ²
D-6.	JPMC HC 0000730 - JPMC HC 0000736	KYC	*
D-7.	JPMC HC 0000137 - JPMC HC 0000176	File	*
D-8.	JPMC HC 0000177 - JPMC HC 0000234	Files	*
D-9.	JPMC HC 0000235 - JPMC HC 0000331	Files	*
D-10.	JPMC HC 0000332 - JPMC HC 0000335	KYC	**
D-11.	JPMC HC 0000336 - JPMC HC 0000456	Files	*
D-12.	JPMC HC 0000555 - JPMC HC 0000557	Letter dated October 12, 2006	**
D-13.	JPMC HC 0000737 - JPMC HC 0000739	Corrective Action Policy	**
D-14.	JPMC HC 0000742 - JPMC HC 0000746	Business Case Exception Form	**
D-15.	JPMC HC 0000777	Affirmation	**
D-16.	JPMC HC 0000778	Affirmation	**
D-17.	JPMC HC 0000779 - JPMC HC 0000806	October 31, 2008 Presentation	*
D-18.	JPMC HC 0000807 - JPMC HC 0000812	KYC	**
D-19.	JPMC HC 0000813 - JPMC HC 0000818	KYC	**
D-20.	JPMC HC 0000819 - JPMC HC 0000902	Due Diligence Report	**
D-22.	JPMC HC 0000905 - JPMC HC 0000909	Business Case Exception Form	**
D-23.	JPMC HC 0001159 - JPMC HC 0001168	Code of Conduct	*
D-29.	JPMC HC 0001878 - JPMC HC 0001881	KYC	**
D-30.	JPMC HC 0001882 - JPMC HC 0001887	KYC	**
D-31.	JPMC HC 0001888 - JPMC HC 0001892	KYC	**
D-32.	JPMC HC 0001893 - JPMC HC 0001896	KYC	**

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**)²
D-33.	JPMC HC 0001897 - JPMC HC 0001903	KYC	**
D-34.	JPMC HC 0001904 - JPMC HC 0001908	KYC	**
D-35.	JPMC HC 0001909 - JPMC HC 0001914	KYC	**
D-36.	JPMC HC 0001915 - JPMC HC 0001917	KYC	*
D-37.	JPMC HC 0001918 - JPMC HC 0001923	KYC	**
D-38.	JPMC HC 0002936 - JPMC HC 0002938	File	*
D-40.	JPMC HC 0002950 - JPMC HC 0002952	Relationship Review	*
D-44.	JPMC HC 0003029 - JPMC HC 0003037	KYC	**
D-45.	JPMC HC 0003038 - JPMC HC 0003047	KYC	**
D-46.	JPMC HC2 0000026 - JPMC HC2 0000031	KYC	*
D-47.	JPMC HC2 0000037 - JPMC HC2 0000041	KYC	**
D-48.	JPMC HC2 0000046 - JPMC HC2 0000048	KYC	*
D-49.	JPMC HC2 0000055 - JPMC HC2 0000058	KYC	*
D-50.	JPMC HC2 0000062 - JPMC HC2 0000064	KYC	*
D-51.	JPMC HC2 0000065 - JPMC HC2 0000069	KYC	*
D-52.	JPMC HC2 0000070 - JPMC HC2 0000072	KYC	*
D-53.	JPMC HC2 0000073 - JPMC HC2 0000076	KYC	*
D-54.	JPMC HC2 0000077 - JPMC HC2 0000079	KYC	*
D-55.	JPMC HC2 0000080 - JPMC HC2 0000082	KYC	**
D-56.	JPMC HC2 0000083 - JPMC HC2 0000085	KYC	**
D-57.	JPMC HC2 0000088 - JPMC HC2 0000091	KYC	*

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**) ²
D-58.	JPMC HC2 0000092 - JPMC HC2 0000095	KYC	*
D-59.	JPMC HC2 0000096 - JPMC HC2 0000100	KYC	*
D-60.	JPMC HC2 0000104 - JPMC HC2 0000106	KYC	**
D-61.	JPMC HC2 0000107 - JPMC HC2 0000110	KYC	*
D-62.	JPMC HC2 0000111 - JPMC HC2 0000113	KYC	*
D-63.	JPMC HC2 0000114 - JPMC HC2 0000116	KYC	*
D-65.	JPMC HC2 0000121 - JPMC HC2 0000145	File	*
D-66.	JPMC HC2 0000164 - JPMC HC2 0000165	KYC	*
D-67.	JPMC HC2 0000167 - JPMC HC2 0000168	KYC	*
D-71.	JPMC HC2 0000184 - JPMC HC2 0000185	Notes dated April 30, 2009	**
D-72.	JPMC HC2 0000187	Notes	*
D-73.	JPMC HC2 0000188	Notes	*
D-74.	JPMC HC2 0000189	Notes	*
D-75.	JPMC HC2 0000190	Email dated July 23, 2009	**
D-76.	JPMC HC2 0000191	Notes	**
D-77.	JPMC HC2 0000195 - JPMC HC2 0000216	File	*
D-78.	JPMC HC2 0000217 - JPMC HC2 0000218	Notes	*
D-79.	JPMC HC2 0000219 - JPMC HC2 0000220	Notes	*
D-80.	JPMC HC2 0000269 - JPMC HC2 0000288	Spreadsheet	**
D-81.	JPMC HC2 0000374 - JPMC HC2 0000377	KYC	**
D-82.	JPMC HC2 0000378 - JPMC HC2 0000380	KYC	*
D-83.	JPMC HC2 0000533 - JPMC HC2 0000539	KYC	**
D-84.	JPMC HC2 0000546 - JPMC HC2 0000552	KYC	*

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**)²
D-85.	JPMC HC3 000488 - JPMC HC3 000490	Relationship Review	*
D-87.	JPMC HC3 000497 - JPMC HC3 000510	KYC	*
D-94.	JPMC-00000245 - JPMC-00000247	Email dated April 21, 2009 and attachment	**
D-95.	JPMC-00000251 - JPMC-00000252	Email dated April 21, 2009	**
D-96.	JPMC-00000254	Email dated April 8, 2009	**
D-97.	JPMC-00000255	Email dated April 7, 2009	**
D-99.	JPMC-00000545 - JPMC-00000546	Email dated April 8, 2009	**
D-100.	JPMC-00006651 - JPMC-00006660	Email dated April 7, 2009 and attachment	**
D-101.	JPMC-00000701 - JPMC-00000706	Email dated April 8, 2009 and attachments	**
D-102.	JPMC-00000710	Email dated July 31, 2009	**
D-103.	JPMC-00000712 - JPMC-00000714	Email dated April 22, 2009 and attachment	**
D-104.	JPMC-00000963	Email dated May 16, 2009	**
D-105.	JPMC-00000965 - JPMC-00000966	Email dated April 8, 2009 and attachment	**
D-106.	JPMC-00000967 - JPMC-00001030	Email dated May 4, 2009 and attachment	**
D-107.	JPMC-00001033	Meeting invite dated July 5, 2009	**
D-108.	JPMC-00001042 - JPMC-00001104	Email dated May 1, 2009 and attachment	**
D-109.	JPMC-00001105 - JPMC-00001107	Email dated April 22, 2009 and attachment	**
D-110.	JPMC-00001116 - JPMC-00001125	Email dated April 7, 2009	**
D-111.	JPMC-00001139 - JPMC-00001144	Email dated May 4, 2009	**
D-112.	JPMC-00001146	Meeting invite	**
D-113.	JPMC-00001337	Email dated July 29, 2009	**
D-114.	JPMC-00001338 - JPMC-00001340	Email dated July 28, 2009 and attachments	**
D-115.	JPMC-00001341 - JPMC-00001344	Email dated July 21, 2009 and attachments	**
D-117.	JPMC-00001348 - JPMC-00001351	Email dated July 10, 2009 and attachments	**

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**) ²
D-118.	JPMC-00001376	Email dated May 5, 2009	**
D-119.	JPMC-00002183	Meeting invite dated May 5, 2009	**
D-120.	JPMC-00002239	Email dated May 4, 2009	**
D-121.	JPMC-00002252 - JPMC-00002254	Email dated April 24, 2009 and attachment	*
D-124.	JPMC-00002281	Email dated July 31, 2009	**
D-128.	JPMC-00002506	Email dated July 22, 2009	**
D-129.	JPMC-00002548 - JPMC-00002550	Email dated July 27, 2009	**
D-130.	JPMC-00002552 - JPMC-00002554	Email dated July 24, 2009	**
D-132.	JPMC-00002565 - JPMC-00002566	Email dated April 8, 2009 and attachment	**
D-135.	JPMC-00002611	Email dated August 4, 2009	**
D-138.	JPMC-00002704	Email dated July 28, 2009	**
D-139.	JPMC-00002716	Email dated July 26, 2009	**
D-140.	JPMC-00002723	Email dated July 24, 2009	**
D-142.	JPMC-00002800	Meeting invite	**
D-145.	JPMC-00002842	Email dated July 1, 2009	**
D-151.	JPMC-00002911	Email dated June 26, 2009	**
D-165.	JPMC-00003043 - JPMC-00003049	Email dated September 5, 2008	*
D-166.	JPMC-00003136 - JPMC-00003137	Email dated September 4, 2008	**
D-178.	JPMC-00005933	Email dated May 22, 2009	**
D-179.	JPMC-00005973	Email dated April 27, 2009	**
D-180.	JPMC-00005974	Email dated April 27, 2009	*
D-181.	JPMC-00005975	Email dated April 27, 2009	**
D-183.	JPMC-00006320 - JPMC-00006321	Email dated May 22, 2009	**
D-184.	JPMC-00006402	Email dated May 4, 2009	**
D-185.	JPMC-00006583	Email dated April 27, 2009	**
D-186.	JPMC-00006591 - JPMC-00006593	Email dated April 22, 2009	
D-187.	JPMC-00006599	Email dated April 20, 2009	**
D-188.	JPMC-00006612 - JPMC-00006620	Email dated April 7, 2009	**
D-191.	JPMC-00006986	Email dated June 8, 2009	**

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**) ²
D-192.	JPMC-00007016	Email dated June 2, 2009	*
D-193.	JPMC-00007192 - JPMC-00007194	Email dated April 21, 2009	**
D-194.	JPMC-00007197	Email dated April 20, 2009	**
D-195.	JPMC-00007198	Email dated April 20, 2009	**
D-196.	JPMC-00007221 - JPMC-00007229	Email dated April 7, 2009 and attachment	**
D-197.	JPMC-00007240 - JPMC-00007247	Email dated April 3, 2009	**
D-198.	JPMC-00007423	Email dated April 30, 2009	**
D-212.	JPMC2-00000550 - JPMC2-00000551	Email dated December 10, 2009	**
D-213.	JPMC2-00000552 - JPMC2-00000553	Email dated August 6, 2009	*
D-214.	JPMC2-00000554	Email dated August 4, 2009	*
D-215.	JPMC-00000715 - JPMC-00000778	Email dated May 4, 2009 and attachment	**
D-216.	JPMC2-00002642 - JPMC2-00002662	Email dated June 26, 2009 and attachments	**
D-218.	JPMC2-00002685	Email dated July 21, 2009	**
D-219.	JPMC2-00002686 - JPMC2-00002736	Email dated July 3, 2009 and attachment	**
D-220.	JPMC2-00002758 - JPMC2-00002796	Email dated June 28, 2009 and attachment	**
D-221.	JPMC2-00004070 - JPMC2-00004071	Email dated December 5, 2008 and attachment	**
D-223.	JPMC2-00064599 - JPMC2-00064604	Email dated February 24, 2010	**
D-227.	JPMC2-00007788 - JPMC2-00007793	Email dated January 15, 2010	**
D-232.	JPMC2-00007844 - JPMC2-00007846	Email dated December 20, 2009	*
D-279.	JPMC2-00064607 - JPMC2-00064628	Email dated September 25, 2009 and attachment	**
D-280	JPMC2-00064629 - JPMC2-00064693	Email dated July 7, 2009 and attachment	**
D-285.	JPMC2-00064706 - JPMC2-00064711	Email dated January 13, 2010	**
D-286.	JPMC2-00064723 - JPMC2-00064727	Email dated January 8, 2010	*
D-287.	JPMC2-00064731	Email dated July 21, 2009	**

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**) ²
D-288.	JPMC2-00064734 - JPMC2-00064789	Email dated July 31, 2009 and attachment	*
D-289.	JPMC2-00071388	Email dated June 20, 2008	*
D-290.	JPMC2-00072123	Email dated September 28, 2009	*
D-291.	JPMC2-00072124	Email dated September 17, 2009	**
D-294.	JPMC2-00072148 - JPMC2-00072149	Email dated November 20, 2009	*
D-302.	JPMC2-00072194	Email dated September 29, 2009	*
D-303.	JPMC2-00072196	Email dated September 17, 2009	**
D-305.	JPMC2-00072199	Meeting invited dated September 15, 2009	*
D-306.	JPMC2-00072201 - JPMC2-00072203	Email dated September 2, 2009	*
D-308.	JPMC2-00083663 - JPMC2-00083700	Email dated April 18, 2008 and attachment	**
D-309.	JPMC2-00087589	Email dated May 4, 2009	*
D-310.	JPMC2-00087596 - JPMC2-00087598	Email dated April 29, 2009 and attachments	**
D-311.	JPMC2-00087599 - JPMC2-00087602	Email dated April 29, 2009 and attachments	*
D-312.	JPMC2-00087611	Email dated April 24, 2009	*
D-317.	JPMC2-00087772	Email dated October 27, 2009	*
D-319.	JPMC2-00087795 - JPMC2-00087798	Email dated October 2, 2009 and attachment	**
D-322.	JPMC2-00087805	Email dated October 1, 2009	*
D-325.	JPMC2-00087813 - JPMC2-00087815	Email dated August 26, 2009 and attachments	*
D-326.	JPMC2-00087870 - JPMC2-00087872	Email dated October 9, 2009	*
D-330.	JPMC2-00087882 - JPMC2-00087884	Email dated September 2, 2009	*
D-331.	JPMC2-00087887	Email dated August 27, 2009	*
D-332.	JPMC2-00087890	Email dated August 25, 2009	*
D-334.	JPMC2-00087894 - JPMC2-00087929	Email dated June 26, 2009 and attachment	**
D-335.	JPMC2-00087933 - JPMC2-00087934	Email dated December 2, 2009	*
D-338.	JPMC2-00087959	Email dated September 1, 2009	*
D-339.	JPMC2-00087962 - JPMC2-00087963	Email dated June 30, 2009	*

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**)²
D-344.	JPMC2-00088262	Email dated July 29, 2009	**
D-345.	JPMC2-00088328 - JPMC2-00088340	Email dated October 27, 2009 and attachments	*
D-347.	JPMC2-00088399	Email dated September 16, 2009	**
D-350.	JPMC2-00088473 - JPMC2-00088475	Email dated October 1, 2009 and attachment	**
D-351.	JPMC2-00088477	Email dated August 26, 2009	*
D-367.	JPMC2-00089002 - JPMC2-00089011	Email dated October 9, 2009 and attachments	*
D-368.	JPMC2-00089012	Email dated September 8, 2009	**
D-369.	JPMC2-00089059 - JPMC2-00089065	Email dated November 9, 2009 and attachment	*
D-376.	JPMC2-00089245 - JPMC2-00089313	Email dated October 27, 2009 and attachments	*
D-379.	JPMC2-00089377	Email dated September 14, 2009	*
D-380.	JPMC2-00089378	Email dated September 8, 2009	*
D-381.	JPMC2-00089379	Email dated August 27, 2009	**
D-393.	JS 0013 - JS 0043	Code of Conduct	*
D-394.	JS 004 - JS006	Review Information	**
D-401.	JS 0239 - JS 0240	Resume	**
D-402.	JS 0241 - JS 0242	Resume	*
D-403.	JS 0243	Itinerary	*
D-404.	JS 0244 - JS 0298	Notes	*
D-405.	JS 0299	Email dated October 13, 2010	*
D-406.	JS 0300 - JS 0301	Email dated October 7, 2010	*
D-407.	JS 0302	Email dated September 17, 2009	*
D-408.	JS 0303 - JS 0304	Email dated September 8, 2009	*
D-409.	JS 0305	Email dated September 2, 2009	*
D-410.	JS 0306 - JS 0307	Email dated October 16, 2009	*
D-411.	JS 0308	Email dated November 11, 2009	*
D-412.	JS 0309	Email dated December 2, 2009	*
D-413.	JS 0310	Email dated October 14, 2009	*
D-414.	JS 0311	Email dated November 30, 2009	*
D-415.	JS 0312	Email dated December 2, 2009	*
D-416.	JS 0313 - JS 0314	Email dated March 16, 2010 and attachment	*
D-417.	JS 0315 - JS 0319	Email dated October 16, 2009	*
D-418.	JS 0320 - JS 0323	Email dated September 29, 2009	*

Exhibit Letter	Bates Range	Description	No Authenticity Objection (*) No Objection (**)²
D-419.	JS 0526 - JS 0532	Print-Out	**
D-420.	JPMC-HC4-0000014 - JPMC-HC4-0000050	Handwritten Notes	
D-421.	JPMC-HC4-0000060	Handwritten Notes	*

To the extent all members of a document family are not listed above, Defendants reserve the right to offer into evidence any other members of the document family if not included in the above Bates range.

Plaintiffs have stipulated to the admissibility of Defendants' Exhibits 13 (JPMC HC 0000737 - JPMC HC 0000739), 75 (JPMC HC2 0000190), 76 (JPMC HC2 0000191), 80 (JPMC HC2 0000269 - JPMC HC2 0000288), 95 (JPMC-00000251 - JPMC-00000252), 96 (JPMC-00000254), 97 (JPMC-00000255), 100 (JPMC-00006651 - JPMC-00006660), 101 (JPMC-00000701 - JPMC-00000706), 102 (JPMC-00000710), 103 (JPMC-00000712 - JPMC-00000714), 106 (JPMC-00000967 - JPMC-00001030), 108 (JPMC-00001042 - JPMC-00001104), 109 (JPMC-00001105 - JPMC-00001107), 111 (JPMC-00001139 - JPMC-00001144), 113 (JPMC-00001337), 114 (JPMC-00001338 - JPMC-00001340), 117 (JPMC-00001348 - JPMC-00001351), 120 (JPMC-00002239), 124 (JPMC-00002281), 129 (JPMC-00002548 - JPMC-00002550), 130 (JPMC-00002552 - JPMC-00002554), 135 (JPMC-00002611), 139 (JPMC-00002716), 142 (JPMC-00002800), 145 (JPMC-00002842), 178 (JPMC-00005933), 179 (JPMC-00005973), 181 (JPMC-00005975), 183 (JPMC-00006320 - JPMC-00006321), 185 (JPMC-00006583), 186 (JPMC-00006591 - JPMC-00006593), 193 (JPMC-00007192 - JPMC-00007194), 194 (JPMC-00007197), 195 (JPMC-00007198), 212 (JPMC2-00000550 - JPMC2-00000551), 215 (JPMC-00000715 - JPMC-00000778), 216 (JPMC2-00002642 - JPMC2-00002662), 218 (JPMC2-00002685), 219 (JPMC2-00002686 - JPMC2-00002736), 220 (JPMC2-00002758 - JPMC2-00002796), 221 (JPMC2-00004070 - JPMC2-00004071), 223 (JPMC2-00064599 - JPMC2-00064604), 227 (JPMC2-00007788 - JPMC2-00007793), 279 (JPMC2-00064607 - JPMC2-00064628), 280 (JPMC2-00064629 - JPMC2-00064693), 285 (JPMC2-00064706 - JPMC2-00064711), 287 (JPMC2-00064731), 291 (JPMC2-00072124), 303 (JPMC2-00072196), 308 (JPMC2-00083663 - JPMC2-00083700), 310 (JPMC2-00087596 - JPMC2-00087598), 319 (JPMC2-00087795 - JPMC2-00087798), 334 (JPMC2-00087894 - JPMC2-00087929), 344 (JPMC2-00088262), 347 (JPMC2-00088399), 350 (JPMC2-00088473 - JPMC2-00088475), 368 (JPMC2-00089012), 381 (JPMC2-00089379), and 401 (JS 0239 - JS 0240).

Defendants reserve the right to offer into evidence any and all exhibits listed by Plaintiff. Defendants also reserve the right to supplement this exhibit list with any documents still to be produced. Defendants reserve the right to use unlisted exhibits for purposes of impeachment or rebuttal or any other purpose permitted by the Federal Rules of Evidence. Defendants also reserve the right to amend and/or supplement this JPTO consistent with the Federal Rules of Civil Procedure, Local Civil Rules for the Southern and Eastern District of New York and/or Individual Rules of the Honorable Denise L. Cote, or as otherwise appropriate and/or necessary.

Defendants reserve the right to object to the admissibility of any of Plaintiff's exhibits at trial depending on the basis on which and/or purpose for which Plaintiff seeks to use any listed exhibit. In addition, as indicated above, Defendants do not object to the authenticity of any of Plaintiff's exhibits in that Defendant does not claim that any of Plaintiff's exhibits are fabricated or fraudulent, based on what Defendants know at the time of submission of the JPTO. Defendants reserve the right to object to the introduction of any exhibit through a witness in contravention of the Federal Rules of Evidence.

Dated: October __, 2017
New York, New York

Respectfully submitted,

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